

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ALBEMARLE CORPORATION,

Plaintiff,

v.

OLIN CORPORATION,

Defendant.

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Civil Action No. 1:23-cv-600

JOINT DISCOVERY PLAN

Pursuant to Fed. R. Civ. P. 26(f), counsel for the parties conferred via videoconference on July 14, 2023, with follow-up communications via e-mail, and respectfully submit this joint discovery plan for the Court's consideration.

Initial Disclosures

The parties have agreed to exchange initial disclosures, in the form required by Fed. R. Civ. P. 26(a), by July 31, 2023.

Limitations on Discovery

The parties have agreed to abide, in the first instance, by Fed. R. Civ. P. 30(a)(2)(A)(i)'s limitation of 10 depositions per party and Fed. R. Civ. P. 33(a)(1)'s limitation of 25 interrogatories per party, subject to the reserved right of any party to timely seek leave of Court to take additional depositions or serve additional interrogatories.

Schedule for Discovery and Other Pretrial Events

The parties agree that the following schedule for fact and expert discovery, and for motions pursuant to Fed. R. Civ. P. 56 and Fed. R. Evid. 702, is realistic given the anticipated

scope and complexity of this case, subject to the reserved right of any party to timely seek leave of Court to extend any deadline for good cause, including any amended complaint or counterclaims that expand the scope of the lawsuit:

- February 15, 2024 – Fact discovery complete
- March 14, 2024 – Expert disclosures under Fed. R. Civ. P. 26(a)(2) for any claims on which the serving party has the burden of proof, including any report required by Fed. R. Civ. P. 26(a)(2)(B)
- May 23, 2024 – Rebuttal expert disclosures
- June 20, 2024 – Expert discovery complete
- July 18, 2024 – Motions pursuant to Fed. R. Civ. P. 56 or Fed. R. Evid. 702
- August 8, 2024 – Responses to Fed. R. Civ. P. 56/Fed. R. Evid. 702 motions
- August 22, 2024 – Replies in support of Fed. R. Civ. P. 56/Fed. R. Evid. 702 motions

Expert Disclosures

The parties have agreed to a Joint Motion for Order Regarding Expert Discovery, which will be submitted separately for the Court's consideration. The parties have also agreed, subject to the Court's approval, to the schedule for expert disclosures and discovery set forth above.

Discovery of Electronically Stored Information

The parties have agreed to a Joint Motion for Order Governing Production of Electronically Stored Information, which will be submitted separately for the Court's consideration.

Protective Order / Claims of Privilege or Work-Product Protection

The parties have agreed to a Joint Motion for Protective Order, which will be submitted separately for the Court's consideration. The agreed-upon Protective Order, subject to the Court's approval, includes provisions governing claims of privilege and work-product protection

that the parties have agreed to and respectfully ask the Court to approve pursuant to Fed. R. Evid. 502(d)-(e).

Methods of Service

The parties have consented to service via e-mail to all counsel of record of any papers that are required to be served but that are not automatically served via the Court's electronic filing system.

Dated: July 27, 2023

/s/ William T. DeVinney

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Respectfully submitted,

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